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February 9, 2005

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VIA ELECTRONIC MAIL AND ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St, SW
Washington, D.C. 20554

Re: Highland Cellular, Inc. Update to E911 Interim Compliance Report, CC
Docket No. 94-102

Dear Ms. Dortch:

Highland Cellular, LLC ("Highland"), by its attorneys, filed an interim E911 compliance report on January 15, 2004 pursuant to the Order to Stay adopted in CC Docket No. 94-102 on October 10, 2003.¹ This letter provides some additional information requested by staff to update the docket.

In its January 15, 2004 letter, Highland noted that it is in the process of converting its subscriber base to GSM technology. Highland predicted that, "its projected GSM subscriber base at the end of 2004 will be 50 percent." In fact, as of January 1, 2005, Highland transitioned roughly 52% of its customers to the GSM network, and approximately 70% of the total minutes of use are now served by the GSM infrastructure. Highland now predicts that, by the end of 2005, approximately 80% of its customers will be using GSM handsets.

Highland's interim compliance report also noted that Highland has been actively working with the PSAPs in its community not only with respect to E911 deployment, but also with respect to co-location and coverage issues. Highland noted that it had conducted a series of update meetings with the PSAP directors who had filed Phase II requests, and indicated that it intended to continue to meet with the PSAP directors on a regular basis. Highland has, in fact, continued to hold meetings with the PSAPs every few months to provide updates on progress with vendor discussions, the technology trials, and the options for deployment. The PSAPs have supported the direction which Highland is taking on Phase II deployment.

Specifically, as noted in its interim report, Highland was investigating proposals from a number of technology vendors. At the time of its interim report, Highland had received projection maps from two vendors, and was awaiting accuracy

¹ Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, FCC 03-241 (2003) ("*Small Carrier Order*").

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projections from a third vendor. Highland has continued its selection process, and has received proposals from Trueposition and Grayson for TDOA technology, Polaris on RFID technology, and Nortel on TA/NMR technology. Because Highland's technical review of each option has led the company to believe that the topography and cell density of the Highland network is such that none of the technology options will allow the company to meet the FCC's accuracy requirements, Highland continues to hold discussions with the vendors and the PSAPs as to the preferred solution. Highland and the PSAPs have reached accord that the public would be best served by the deployment of the technology that provides the best long term accuracy standard, and are engaged in discussions with the technology vendors to meet that goal.

Should any questions arise concerning this filing, please contact the undersigned at 202.418.3182.

Sincerely,

/s/ Eric W. DeSilva

Eric W. DeSilva